

REMARKS

The Office Action dated March 3, 2011, has been reviewed and the Examiner's comments carefully considered. In view of the amendments and following remarks, Applicants respectfully request favorable reconsideration of the claims. Presently, claims 1-11 are pending in this application. Claim 1 is in independent form. Independent claim 1 has been amended. Support for the amendment can be found at paragraphs [0008] and [0009] of the present publication. No new matter has been added.

Claims 1-3, 5, 7-9, and 11 are rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Application Publication No. 2001/0031066 to Meyer et al. ("the Meyer publication") in view of U.S. Patent Application Publication No. 2004/0019608 to Obrador ("the Obrador publication"). Claims 4, 6, and 10 are rejected under 35 U.S.C. § 103(a) for obviousness over the Meyer publication in view of the Obrador publication and further in view of U.S. Patent Application Publication No. 2004/0060070 to Mizushima ("the Mizushima publication") or U.S. Patent Application Publication No. 2003/0163823 to Logan et al ("the Logan publication").

Amended independent claim 1 of the present application claims a system for providing lyrics for a plurality of digital audio files, including at least one terminal configured to select a digital audio file among digital audio files using a reproducing time period to identify a unique file. This feature is not described in the Obrador publication, which describes using playback length only to categorize. The Obrador publication discloses a management system for organizing media objects in relation to each other based on shared characteristics of the media objects. Paragraph [0054] of the Obrador publication discloses the aspect of selecting related media objects using playback length (see the Obrador publication, paragraph [0054] stating "the relevance criteria used to select the media objects that will be presented contemporaneously with the selected media file may relate to a selected metadata *similarity* between media objects and the selected media file" (emphasis added)). In contrast, independent claim 1 of the present application now specifically requires using the reproducing time period for identifying a unique, particular file. This means a playback length can be used to differentiate between files based on the length of each respective digital audio file because there may be different versions of the

same song. This claim addresses the concerns as expressed in the Office Action, where the Examiner states that the features upon which Applicants rely are not recited in the rejected claims (see Office Action, page 2). For the foregoing reasons, Applicants believe that the subject matter of independent claim 1 is not taught or suggested by the Obrador publication or any of the cited prior art. Therefore, amended claim 1 of the present application is not obvious over the combination of the Meyer publication in view of the Obrador publication, the Mizushima publication, or the Logan publication. Claims 2-11 depend from and add further limitation to independent claim 1 and are believed to be patentable for the same reasons.

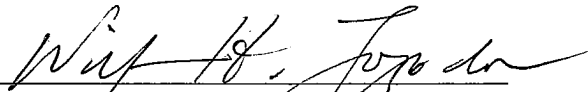
The Examiner's reasoning for combining the teachings of the Meyer publication with that of the Obrador publication relates to selecting media objects having the highest metadata similarity. However, neither this motivation nor the cited playback length disclosure relates to *differentiating between different* files, as is the purpose of the claimed invention (i.e., the ability to differentiate between files based on the length of each respective digital audio file is useful because there may be different versions of the same song). Thus, the playback length data is used to group related files together, as opposed to identifying a unique, particular file. Accordingly, a person of ordinary skill in the art would not look to the Obrador publication for teaching of claim 1, since the primary purpose of claim 1 is for identifying a particular file. Claims 2-11 depend directly or indirectly to claim 1 and are believed to be in condition for allowance for the same reasons as claim 1.

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Based on the foregoing amendments and remarks, reconsideration of the rejections and allowance of pending claims 1-11 are respectfully requested.

Respectfully submitted,

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